

### **REMARKS**

Applicant has carefully reviewed the office action mailed December 5. The present amendment is intended to be fully responsive to all points of objection raised by the examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance is hereby solicited. Applicant notes that the above office action does not indicate receipt of the amendment and response filed October 26, 2005. On March 28, 2006 the examiner was contacted by telephone and advised that indeed the amended had been entered. This amendment and response is therefore filed on that basis.

Paragraph 0023 has been amended to more clearly clarify the meaning, by incorporating some of the description in paragraph 0021. Claims 1, 5-8, 10, 12 – 18, and 21 have been amended. Support for the amendments to the claims may be found in the originally filed specifications and claims. Claims 1 – 21 remain in the case.

It is the object of the present invention to provide a wide format electrophotographic printing system comprising a plurality of sub-units smaller than the wide format image to be printed. An electrophotographic printing system is a contact printing systems, which “uses electrostatic charges, dry ink (toner) and light. A selenium-coated photoconductive drum is positively charged. Using a laser or LEDs, a negative of the image is beamed onto the drum, cancelling the charge and leaving a positively charged replica of the original image. A negatively charged toner is attracted to the positive image on the drum. The toner is then attracted to the paper, which is also positively charged. The final stage is fusing, which uses heat and pressure, pressure alone or light to cause the toner to permanently adhere to the paper.” (source – the free dictionary by Farlex). It well known in the art that an OPC drum is equivalent in function to a selenium-coated photoconductive drum.

Additionally, attached please find a declaration under 37 CFR 1.132 executed by one of the inventors in the case, which further clarifies the use of an OPC drum according to the prior art as well as the inventive step involved in the subject invention. In particular, the issue of overlap for which a charged OPC drum is in contact with a newly printed surface is further

explained.

**Rejection under 35 U.S.C. §102:**

Claims 1, 11 and 12 stand rejected under 35 U.S.C. 103(b) as being anticipated by McGarry et al (U.S. Patent No. 6,375,296). McGarry is addressed to an inkjet printing system including a first printhead subarray and a second printhead subarray. *“Inkjet printing systems operate by ejecting ink drops through a plurality of orifices or nozzles toward a print medium”* (Col. 1 ln. 13 -15). *“A print zone 17 is defined adjacent to nozzles 13 in an area between inkjet printhead assembly 12 and print medium 19.”* (Col. 3 ln. 45 -47) Inkjet printing systems are non-contact, and thus a subsequent printhead does not impact the substrate at a point printed upon by a prior printhead.

As described above, and as further attested to in the attached declaration submitted under 37 CFR 1.132, an electrophotographic printing system is a contact printing system. As such, and as described at paragraph 0021 and 0023 in the claimed embodiment, an overlap exists between the sub-units. Thus, a second sub-unit is in contact with the substrate in an area in which a first sub-unit has printed. In particular, and as further described in paragraph 0022, an electrophotographic printing sub-unit comprises an OPC drum which is charged by the corona. Such a charged OPC drum of the second sub-unit in contact with the printing of the first sub-unit in the overlap area may affect the printing of the first sub-unit. This is to be clearly distinguished from McGarry which is an inkjet printing solution, in which no contact overlap occurs.

Thus, amended claims 1 and 12 are not anticipated by McGarry, as each and every element as set forth in the claim is not found, either expressly or inherently described, in the single prior art reference (*Verdegaal Bros. V. Union Oil Col of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). Dependent claim 11, which depends on claim 11 is also deemed patentable, being dependent on patentable claim 1.

It would not have been obvious to modify McGarry for use with a contact printing system since the problem to be resolved is quite different. In particular, McGarry neither teaches nor suggests a contact printing system with its use of a high voltage corona. A contact printing system with a high voltage corona suggests a myriad of difficulties which are not anticipated or even suggested by McGarry.

**Rejection under 35 U.S.C. §103:**

Claims 1, 8-11, 12, 22 and 23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kamir et al (U.S. Publication S/N 2002/0109663) in view of McGarry et al (U.S. Patent No. 6,375,296).

As described above McGarry does not teach the use of a plurality of contact electrophotographic printing systems exhibiting an overlap. Kamir similarly does not teach the use of a plurality of contact electrophotographic printing system sub-units, each printing a portion of a width of wide format image, exhibiting an overlap. Kamir exhibits a plurality of sub-units which are of different colors each printing across the entire width of the erasable screen. Thus, there is no particular overlap area which is different from the rest of the printing area. Instead, in one embodiment each color sub-unit prints the entire image width on its own screen, and in another embodiment the individual color sub-units print uniformly across the entire width.

Thus, neither McGarry nor Kamir teach all the limitations of amended independent claims 1 and 12. To establish *prima facie* obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Dependent claims 8-11, 22 and 23 which depend respectively from amended claims 1 and 12 are thus also deemed patentable.

Claims 2, 4, 6,7 and 18 -21 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kamir et al (U.S. Publication S/N 2002/0109663) in view of McGarry et al (U.S. Patent No. 6,375,296) and further in view of Narushima et al (U.S. Patent 6,831,755). Narushima does not teach the use of an electrophotographic printing apparatus comprised of a plurality of narrower

sub-units exhibiting an overlap. Thus, neither McGary nor Kamir nor Narushima teach all the limitations of amended independent claims 1 and 12. To establish *prima facie* obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Dependent claims 2,4, 6, 7, and 18 -21 which depend respectively from amended claims 1 and 12 are thus deemed patentable.

Claim 3 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kamir et al (U.S. Publication S/N 2002/0109663) in view of McGarry et al (U.S. Patent No. 6,375,296), Narushima et al (U.S. Patent 6,831,755) and Bowers (US Patent 5,296,947). None of the above mentioned references teaches the use of an electrophotographic printing apparatus comprised of a plurality of narrower sub-units exhibiting an overlap. Thus, neither McGary nor Kamir nor Narushima nor Bowers teach all the limitations of amended independent claims 1 and 12. To establish *prima facie* obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Dependent claim 3 which depends from amended claim 1 is thus deemed patentable.

Claims 5 and 13 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kamir et al (U.S. Publication S/N 2002/0109663) in view of McGarry et al (U.S. Patent No. 6,375,296) and further in view of Takahashi et al (U.S. Patent 5,847,729). Takahashi does not teach the use of an electrophotographic printing apparatus comprised of a plurality of narrower sub-units exhibiting an overlap. Thus, neither McGary nor Kamir nor Takahashi teach all the limitations of amended independent claims 1 and 12. To establish *prima facie* obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Dependent claims 5 and 13 which depend respectively from amended claims 1 and 12 are thus deemed patentable.

Claim 14 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kamir et al (U.S. Publication S/N 2002/0109663) in view of McGarry et al (U.S. Patent No. 6,375,296), Narushima et al (U.S. Patent 6,831,755) and Takahashi (US Patent 5,847,729). None of the above mentioned references teaches the use of an electrophotographic printing apparatus

comprised of a plurality of narrower sub-units exhibiting an overlap. Thus, neither McGary nor Kamir nor Narushima nor Takahashi teach all the limitations of amended independent claims 1 and 12. To establish *prima facie* obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Dependent claim 14 which depends from amended claim 12 is thus deemed patentable.

Claims 15 and 16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kamir et al (U.S. Publication S/N 2002/0109663) in view of McGarry et al (U.S. Patent No. 6,375,296), Takahashi et al (U.S. Patent 5,847,729), Narushima et al (U.S. Patent 6,831,755) and Prats (U.S. Patent 4,937,593). Neither Kamir, nor McGarry, nor Takahashi, nor Narushima, nor Prats teaches the use of an electrophotographic printing apparatus comprised of a plurality of narrower sub-units exhibiting an overlap. Thus, they do not teach all the limitations of amended independent claims 1 and 12. To establish *prima facie* obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Dependent claims 15 and 16 which depend from amended claim 12 are thus deemed patentable.

Claim 17 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kamir et al (U.S. Publication S/N 2002/0109663) in view of McGarry et al (U.S. Patent No. 6,375,296), Takahashi (US Patent 5,847,729) and Tuli (U.S. Patent No. 6,154,242). None of the above mentioned references teaches the use of an electrophotographic printing apparatus comprised of a plurality of narrower sub-units exhibiting an overlap. Thus, neither McGary nor Kamir nor Takahashi nor Tuli teach all the limitations of amended independent claims 1 and 12. To establish *prima facie* obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Dependent claim 17 which depends from amended claim 12 is thus deemed patentable.

### **CONCLUSION**

In view of the foregoing, reconsideration and allowance of all pending claims (i.e., claims 1 – 23) is respectfully requested. The Examiner is encouraged to contact Applicant's undersigned agent by telephone through the below telephone number, or by e-mail at Simonka@Barak.net.il if it would in any way aid in the advancement of this application to issue.

Respectfully submitted,

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